



City of Santa Barbara California

PLANNING COMMISSION STAFF REPORT

REPORT DATE: July 6, 2005
AGENDA DATE: July 14, 2005
PROJECT ADDRESS: 121 W. De la Guerra Street (MST2004-00774)
TO: Planning Commission
FROM: Planning Division, (805) 564-5470
Jan Hubbell, AICP, Senior Planner
Allison De Busk, Associate Planner

I. PROJECT DESCRIPTION

The project site is a 22,500 square foot parcel located on West De la Guerra Street between Chapala and De la Vina Streets in downtown Santa Barbara. The proposed project consists of a mixed-use development containing 14 residential condominiums, 3 of which would be affordable to middle-income home buyers, and 3,310 square feet of commercial space. A total of 44 parking spaces would be provided in a semi-subterranean parking garage. Vehicular access would be provided via a two-way entry/exit from De la Guerra. The existing 1,200 square foot office building and 65-car parking lot would be demolished. Refer to Exhibits B and C, Site Plan and Applicant Letter, for additional details.

II. REQUIRED APPLICATIONS

The discretionary applications required for this project are:

1. A Modification of the lot area requirements to allow for three inclusionary housing (bonus density) units on a lot in the C-2 Zone (SBMC § 28.92.026.A.2);
2. A Modification to allow a portion of the required 10% open space area to be provided on the second level of the building (SBMC §28.92.026.A.2); and
3. A Tentative Subdivision Map (TSM) for a one lot subdivision to create 14 residential condominiums and one commercial condominium (SBMC Chapters 27.07 and 27.13).

III. RECOMMENDATION

With the approval of the requested modifications, the proposed project conforms to the City's Zoning and Building Ordinances and policies of the General Plan. In addition, the size and massing of the project are consistent with the surrounding neighborhood. Given that the City is generally built out, and the opportunity for increased residential development is minimal, this is a good opportunity to provide additional housing units in the City's Downtown area. Therefore, Staff recommends that the Planning Commission approve the project, making the findings outlined in Section VIII of this report, and subject to the conditions of approval in Exhibit A.



Vicinity Map – 121 W. De la Guerra Street

DATE APPLICATION ACCEPTED: June 24, 2005
DATE ACTION REQUIRED PER MAP ACT: September 12, 2005

IV. SITE INFORMATION AND PROJECT STATISTICS

SITE INFORMATION

Applicant: Thomas Luria	Property Owner: The Rametto Company
Parcel Number: 037-082-002	Lot Area: 22,500 sq. ft.
General Plan: General Commerce and Residential, 12 units per acre	Zoning: C-2, Commercial Zone
Existing Use: Office and parking lot	Topography: Relatively flat
Adjacent Land Uses:	
North – Commercial	East – Commercial
South – Residential	West – Commercial and Residential

PROJECT STATISTICS

	Type	Affordability	Bed-rooms	Sq. Ft.	Parking	Private Outdoor Living Space (Sq. Ft.)
Unit 1	One-Story	Middle-Income	1	750	1-car covered	171
Unit 2	One-Story	Middle-Income	Studio	580	1-car covered	160
Unit 3	One-Story	Market Rate	1	990	1-car covered	260
Unit 4	One-Story	Market Rate	1	990	1-car covered	214
Unit 5	Townhouse	Market Rate	1	1,411	1-car covered	168
Unit 6	One-Story	Market Rate	Studio	630	1-car covered	190
Unit 7	Townhouse	Middle-Income	2	1,043	1-car covered	278
Unit 8	Townhouse	Market Rate	1	1,052	1-car covered	230
Unit 9	Townhouse	Market Rate	1	1,212	1-car garage	178
Unit 10	Townhouse	Market Rate	2	1,666	1-car garage	220
Unit 11	Townhouse	Market Rate	2	1,620	1-car garage	210
Unit 12	Townhouse	Market Rate	2	1,649	1-car garage	289
Unit 13	Penthouse	Market Rate	2	1,952	1-car garage	163
Unit 14	Penthouse	Market Rate	2	1,540	1-car garage	90
Commercial		N/A	N/A	3,310	6 spaces	N/A
Garage		N/A	N/A	15,6142	44 total spaces	N/A

V. ZONING ORDINANCE CONSISTENCY

Standard	Requirement/ Allowance	Existing	Proposed
Lot Area Required for Each Unit (Variable Density)	Studio = 1,600 sq. ft. 1-Bdrm = 1,840 sq. ft. 2-Bdrm = 2,320 sq. ft. (2) 1,600 = 3,200 sq. ft. (6) 1,840 = 11,040 sq. ft. (6) 2,320 = 13,920 sq. ft. Total = 28,160 sq. ft.	22,500 sq. ft.	22,500 sq. ft. A lot area modification for 3 inclusionary units (bonus density units affordable to middle-income home buyers) is requested.
Setbacks -Front -Interior -Rear	None None None	None None None	None None None
Building Height	60 feet (4 stories)	15 feet	38 feet

Parking	Residential - 14 spaces Commercial – 6 spaces	N/A 65 spaces	14 spaces 30 spaces
Open Yard	10% of the lot (2,250 sq. ft.)	N/A	4.8% (1,080 sq. ft.) An additional 12% (2,690 sq. ft.) is provided at the podium level
Private Outdoor Living Space	Studio Units – 60 sq. ft. 1-Bd Units – 72 sq. ft. 2-Bd Units – 84 sq. ft.	N/A	No unit has less than 90 sq. ft.
Lot Coverage			
-Building	N/A	1,250 sq. ft. 5.0%	19,636 sq. ft. (87.3%)
-Paving/Driveway	N/A	21,150 sq. ft. 94.0%	1,784 sq. ft. (7.9%)
-Landscaping	N/A	<u>100 sq. ft. 1.0%</u>	<u>1,080 sq. ft. (4.8%)</u>
		22,500 sq. ft. (100%)	22,500 sq. ft. (100%)

The proposed project would meet the requirements of the C-2 Zone, with the exception of the lot area and open yard modifications.

A. LOT AREA MODIFICATION

The City’s Inclusionary Housing Ordinance (SBMC, Chapter 28.43) requires projects that contain 10 or more dwelling units to provide at least 15% of the total units for sale as Inclusionary Units, restricted for owner-occupancy by Middle-Income or Upper-Middle-Income Households. In this case, the applicant is proposing 11 market rate units, which would require 2 units to be restricted to Middle- or Upper-Middle-Income Households.

The applicant is proposing 3 inclusionary units for a total of 14 housing units as part of this project. The residential portion of the project is subject to the lot area provisions of the R-4 (Multiple Residential) Zone, and, therefore, to the City’s variable density standards. Under the variable density provisions, the proposed project would require 28,160 square feet of lot area to construct 14 units (when comprised of 2 studios, 6 one-bedroom units and 6 two-bedroom units). The subject parcel is 22,500 square feet, thus the applicant is requesting a lot area modification to allow 3 inclusionary units (resulting in a density of 27 dwelling units per acre).

Staff is supportive of the proposed lot area modification because the Zoning Ordinance requires inclusionary units in condominium projects containing more than 10 units, the project will comply with the City’s affordable housing program, and there is a specific modification finding for affordable housing. The lot area modification would also be consistent with the purposes and intent of the City of Santa Barbara Density Bonus Ordinance, the General Plan, Housing Element and Zoning Ordinance, and is necessary to construct a housing development which includes housing affordable to middle- and upper-middle income households.

B. OPEN YARD AREA MODIFICATION

Condominium development requires the provision of open yard area, in this case equal to 10 percent of the lot area. Open yard area must be provided on the ground floor. As the entire project is built above a semi-subterranean parking garage, there is no opportunity to provide significant open yard area on the ground level. Therefore, the applicant is proposing to provide a large portion of the required open yard area on the second level. Because this project is a mixed-use development located in the downtown, staff believes providing open yard area on

the second level is appropriate.

C. PARKING

The property is located within the Central Business District, which has a requirement of one parking space per 500 square feet of nonresidential square footage. The site is also located in a 5% Zone of Benefit, which means that only 95% of the required parking must be provided. The residential parking requirement in the CBD is one covered space per residential unit, with no guest parking requirement. As such, the Zoning Ordinance requires 6 parking spaces for the proposed 3,310 square feet of commercial/office use ($3,110/500 = 6.6$ spaces $\times 95\% = 6.3$) and 14 spaces for the 14 residential units, for a total of 20 spaces. The project includes 44 parking spaces, 24 more than are required by the Code. These excess stalls are proposed to be provided to continue to meet the owner's lease obligation of 24 spaces to the building located at 827-831 State Street. Staff worked with the applicant to limit the number of enclosed and lockable private parking spaces available to the residents with the goal of providing a parking lot where the parking spaces would be shared by the residential and commercial land uses on the site. Bicycle racks and lockers are also included in the project design.

D. RESIDENTIAL CONDOMINIUM DEVELOPMENT

The project would be consistent with the general City requirements and physical standards for new condominium development, per SBMC §27.13.050 and §27.13.060, respectively. The project would provide the required covered parking, 300 cubic feet of private storage space and laundry facilities for each unit. Each of the units would have their own utility meters, and all utilities are proposed to be underground. Each unit would also meet the requirements for private outdoor living space.

E. MEASURE E

The project includes the demolition of approximately 1,200 square feet of commercial space and construction of approximately 3,310 square feet of commercial/office space. Pursuant to the provisions of SBMC §28.87.300, the project would be allocated Measure E nonresidential square footage from the Minor and Small Addition categories (Minor Addition = 1,000 square feet, Small Addition = 1,110 square feet).

VI. ENVIRONMENTAL REVIEW

The Guidelines of the California Environmental Quality Act (CEQA) include a number of types of projects that are generally exempt from environmental review. The Environmental Analyst has determined that the project qualifies for an exemption per CEQA Guidelines §15301, which allows for demolition of up to three commercial structures. The project is also exempt per §15332, which provides for in-fill development projects in urban areas where it is determined that there will be no significant effects on the environment as identified by the following criteria:

A. THE PROJECT IS CONSISTENT WITH THE APPLICABLE GENERAL PLAN DESIGNATION AND ALL APPLICABLE GENERAL PLAN POLICIES AS WELL AS WITH APPLICABLE ZONING DESIGNATION REGULATIONS.

The General Plan designation for this area is General Commercial and Residential. There are

several General Plan policies as well as zoning regulations that apply to the project. These are discussed under Section V of this report. The proposed use is consistent with the site's land use designation as it would provide commercial space as well as residential units. Planning Staff's conclusion is that the project is consistent with the General Plan Land Use Designation, Zoning designation, and applicable policies and regulations.

B. THE PROPOSED DEVELOPMENT OCCURS WITHIN CITY LIMITS ON A PROJECT OF NO MORE THAN FIVE ACRES SUBSTANTIALLY SURROUNDED BY URBAN USES

This project site is 22,500 square feet (0.52 acre) and located within the City of Santa Barbara. The surrounding area is developed with a mix of commercial, office and residential uses. The site is surrounded by urban uses in all directions.

C. THE PROJECT SITE HAS NO VALUE AS HABITAT FOR ENDANGERED, RARE OR THREATENED SPECIES.

The site has been previously disturbed and has no value as habitat for endangered, rare or threatened species. An Arborist's Report has been prepared for the existing Norfolk Island Pine Tree located at the front of the property that is proposed to remain. This is discussed in more detail under Section VIII, B, 4 (Conservation Element) as the tree is not a protected species with regard to environmental review.

D. APPROVAL OF THE PROJECT WOULD NOT RESULT IN ANY SIGNIFICANT EFFECTS RELATING TO TRAFFIC, NOISE, AIR QUALITY, OR WATER QUALITY.

1. **Traffic**

The project will not result in an impact to traffic. Transportation Staff performed an analysis of the estimated vehicle trip generation and distribution for the proposed project. The proposed mixed-use development, based on the net change in land use, would generate approximately ten additional A.M. peak-hour trips, ten additional P.M. peak-hour trips, and 100 average daily trips (ADT).

In order to determine if there is the potential for traffic impacts based on traffic entering an impacted intersection, or causing an intersection to become impacted, the City's practice is to follow five trips in any direction, to or from a site. In the majority of land use locations, once less than five trips are determined to be headed in any one direction, distribution (or "following") of these trips ceases because Staff cannot state with statistical certainty where these trips would be headed on a daily basis. When the additional ten A.M. and P.M. peak-hour trips are assigned to the downtown roadway system beyond one block of the project site, the assignment of the project traffic is less than five trips. Thus, the project would not be expected to significantly impact the existing Downtown road network.

2. **Noise**

According to the City's Master Environmental Assessment (MEA), the project site is located in the less than 60 dBA (decibels) noise corridor. The City Noise Element standard of 60 dBA Ldn (day-night level) for residential development would therefore

be satisfied and potential noise impacts to the development are expected to be less than significant.

3. **Air Quality**

For environmental review purposes, the City of Santa Barbara uses the Santa Barbara County Air Pollution Control District's thresholds of significance for air quality impacts. The Air Pollution Control District has determined that a proposed project will not have a significant air quality impact on the environment if operation of the project will emit (from all project sources, both stationary and mobile) less than 240 pounds per day for ROC and NO_x, and 80 pounds per day for PM₁₀. The proposed project would only emit 1.45 pounds per day of ROC, 2.06 pounds per day of NO_x and 1.66 pounds per day of PM₁₀ (based on results obtained by URBEMIS 2002, Version 8.7 computer program). Thus, long-term emissions associated with the project would be far less than the Santa Barbara County Air Pollution Control District threshold of impact significance for air quality impacts.

The project will involve grading, paving, general construction and landscaping activities, which could result in short term dust related impacts; however, the applicant would be required to incorporate standard dust control mitigation measures during grading and construction activities. These measures are included as Conditions of Approval.

In accordance with City demolition permit requirements and Santa Barbara County Air Pollution Control District requirements, the demolition of the office building requires notification to the Air Pollution Control District prior to issuance of a demolition or building permit to ensure that any discovery of asbestos is properly handled per Air Pollution Control District regulations (Condition of Approval F.2).

4. **Water Quality**

The existing site consists of an asphalt parking area and a 1,200 square foot building. The site, approximately 0.52 acres, drains westerly towards West De la Guerra Street.

Runoff from the garage level would be collected within the structure, treated and pumped to the existing storm drain in West De la Guerra Street. Runoff from the second and third floors would be transported through pipes to the existing storm drain in West De la Guerra Street. Due to the decrease in impermeable area resulting from the project, it is anticipated that there will be an insignificant decrease in the amount of runoff from the site.

Proposed grading for the project would consist of 2,136 cubic yards of cut under the building footprint. Standard erosion and dust control measures have been included in the Conditions of Approval to minimize potential short term impacts to water and air quality.

The proposed project would not be expected to cause significant impacts to water quality, and would likely result in an improvement over the existing condition. The existing site is completely covered by paving and runoff currently sheet flows toward

the street. The proposed project would provide some landscaped areas to capture surface runoff, and runoff collected in the parking garage would be treated prior to entering the City storm drain system. Runoff from rooftops and hardscaped areas would be collected and directed to De la Guerra Street.

5. **Hazardous Materials**

A Phase I site assessment was prepared for the property by Certified Environmental Consultants, Inc. (dated June 10, 2004). The assessment revealed no evidence of current or eminent adverse environmental impacts. The only recommendations included within the Assessment relate to the potential for asbestos-containing materials to be present on site and caution against disturbance or recommend specially trained personnel to handle renovation or demolition. As discussed above under "Air Quality", demolition of the building would require Air Pollution Control District notification.

E. THE SITE CAN BE ADEQUATELY SERVED BY ALL REQUIRED UTILITIES AND PUBLIC SERVICES.

All utilities are existing and available at the site and can be extended to the development. The proposed project would result in an insignificant increase in demand for public services, including police, fire protection, electrical power, natural gas and water distribution and treatment.

VII. ISSUES

A. DESIGN REVIEW

Due to the fact that the subject property is immediately adjacent to El Pueblo Viejo Historic District, and the existing structure required a Historic Structures Report, the Architectural Board of Review deferred design review of the project to the Historic Landmarks Commission (HLC). This project was reviewed by the HLC on two occasions. The first review occurred on November 10, 2004, at which time the project was continued with concerns regarding the mass, bulk and scale of the building, the small side yard setback, amount and design of parking, and some Commissioners had concerns with the angled placement of the building. The project architect revised the plans in response to the HLC's comments.

On December 15, 2004 the project was reviewed again by the HLC and received generally favorable comments with specific comments related to architectural details and landscaping. Refer to Exhibit D for Minutes.

B. COMPLIANCE WITH THE GENERAL PLAN

Before a condominium project and a tentative map can be approved, they must be found consistent with the City's General Plan. The project site is located in the Downtown neighborhood, which is bounded by Santa Barbara, Ortega, De la Vina and Sola Streets and is the Central Core of the City. This area is more intensely used than other parts of the City, and high-density residential development was envisioned on the periphery of the Downtown district.

1. **Land Use Element**

The subject site has a General Plan designation of General Commerce and Residential. The residential portion of the mixed-use development would be subject to the density requirements of the R-3/R-4 Multiple Family Residential Zones, which allow 12 dwelling units to the acre. The General Plan Land Use and Housing Elements recognize, however, that in zones where variable density standards apply, development may exceed the limit of twelve units per acre without causing an inappropriate increase in the intensity of activities. The proposed project would result in a density of 27 units per acre, which, based on the above discussion, would be consistent with the Land Use and Housing Elements of the General Plan.

2. **Housing Element**

The City Housing Element encourages construction of a wide range of housing types to meet the needs of various household types. This proposal would satisfy that goal through the mix of unit types proposed.

The Housing Element Policy related to an Inclusionary Housing Program (Policy 4.4.2) has been realized through the adoption of the City's Inclusionary Housing Ordinance, which applies to this project. The proposed project complies with the Inclusionary Housing Ordinance and is therefore consistent with the Housing Element in this regard.

Neighborhood Compatibility

In accordance with Housing Element Policy 2.8, which requires new development to be compatible with the prevailing character of the neighborhood, the proposed building would be compatible in scale, size and design with the surrounding neighborhood.

The surrounding neighborhood is comprised of a mix of office, residential and commercial buildings, with a wide range of heights. This area of the City is currently in transition, as evidenced by the recently approved projects located nearby along Chapala Street, and by the pending projects in the vicinity.

One of the goals of the Urban Design Guidelines is compatibility of new development with the character of the City, the surrounding neighborhood, and adjacent properties. The Historic Landmarks Commission (HLC) considers the Urban Design Guidelines in reviewing development proposals.

The proposed design is compatible with surrounding development styles and the massing of development in the neighborhood. As discussed above, the HLC is generally supportive of the mass, bulk and scale, and, while some project details still need studying as part of subsequent design review, they find the development to be appropriate for this site and neighborhood.

3. **Circulation Element**

The Circulation Element contains goals and policies that promote housing in and adjacent to the downtown to facilitate the use of alternative modes of transportation and to reduce the use of the automobile. For example, Circulation Element Implementation Strategy

13.1.1 encourages “the development of projects that combine and locate residential uses near areas of employment and services.” This project provides housing as well as commercial space in the downtown and is therefore consistent with this goal.

4. **Conservation Element**

The City's Conservation Element policies provide that significant environmental resources of the City be preserved and protected. The Conservation Element requires implementation of resource protection measures for archaeological, cultural and historic resources; protection and enhancement of visual, creek habitat, biological and open space resources; protection of specimen and street trees; maintenance of air and water quality; and minimizing potential drainage, erosion and flooding hazards.

Tree Protection

An Arborist's Report was prepared by Westree (October 2004) to evaluate the existing Norfolk Island Pine tree located at the front of the property (Exhibit E), which is proposed to remain as part of the project. The Report assesses the well-being of the tree and provides measures for tree protection. The applicants are proposing to preserve the tree and will follow the recommendations outlined in the Report. All recommendations for tree protection have also been incorporated into the conditions of approval. Please refer to the Conditions of Approval B.1.

The Norfolk Island Pine tree was also evaluated in terms of its significance as an historic resource (see discussion below related to Historic Resources).

Historic Resources

A Historic Structures Report was prepared for the site by Alexandra Cole (February 2005). This report concludes that the building would not qualify as a Structure of Merit and is therefore not an historic resource under CEQA. Thus, demolition of the building would not constitute a potential adverse environmental effect to an historic resource. The report does find that the Norfolk Island Pine located on site is an important tree and should be preserved. As the proposal includes maintenance and protection of this tree, the project would not have an adverse effect on this resource. No additional mitigation was recommended.

The report was accepted by the Historic Landmarks Commission on March 2, 2005, with the following conditions: the HLC recommends that the City Arborist designate the Norfolk Island pine tree as a specimen tree and that the applicant return with large scale black and white photographs of the building to be submitted to the City before the demolition. These conditions have been incorporated into the project's conditions of approval.

Archaeological Resources

The Conservation Element provides for protection of cultural resources, including important archaeological sites. The City's cultural sensitivity maps indicate that this site is located in several cultural sensitivity zones including the Spanish/Mexican

Period, 1850-1870; the Hispanic-American Transition Period, 1850-1870; the American Period 1870-1900; and the Early 20th Century, 1900-1920 cultural sensitivity zones. A Phase 1 Cultural Resources Report assessing potential impacts to any historic or archaeological resources was required, and was approved by the Historic Landmarks Commission on February 16, 2005.

The Phase I Archaeology Report, prepared by Macfarlane Archaeological Consultants and dated February 2, 2005, found no prehistoric or historic archeological sites recorded within the property; however, ground visibility was very poor since the site is currently paved. Given the potential for the parcel to contain cultural material relating to the former residences (c.1877 and c.1892) on site, and the obscured ground surface of the parcel, the Archaeology Report recommended that the property be re-inspected after the existing pavement has been removed. Per City MEA procedures, if any artifacts, features or deposits of historic or prehistoric nature are encountered during the extended Phase I investigations, excavation would be halted and/or redirected while these cultural remains are assessed and as necessary, mitigation implemented. Please refer to the Conditions of Approval E.3.

VIII. FINDINGS

The Planning Commission finds the following:

A. OPEN YARD AREA MODIFICATION (SBMC §28.92.026)

The modification is consistent with the purposes and intent of the Zoning Ordinance and is necessary to secure an appropriate improvement on a lot, prevent unreasonable hardship, or promote uniformity of improvement. The proposed project would provide adequate open space area to meet the Zoning Ordinance requirement (at least 10% of the total lot area); however, because it is being provided on the second floor instead of the ground level, a modification is required. The requested modification is consistent with the purpose and intent of the Zoning Ordinance to provide open space areas in new development, and it is necessary to secure an appropriate improvement on a lot. Providing the open space area on the second floor is appropriate in urbanized areas, especially in the downtown core.

B. LOT AREA MODIFICATION (SBMC §28.92.026)

The modification is consistent with the purposes and intent of the Zoning Ordinance and is necessary to provide three inclusionary housing units affordable to middle-income households.

C. TENTATIVE MAP (SBMC §27.07.100)

The Tentative Subdivision Map is consistent with the General Plan and the Zoning Ordinance of the City of Santa Barbara. The site is physically suitable for the proposed development, the project is consistent with the variable density provisions of the Municipal Code and the General Plan, and the proposed use is consistent with the Land Use Element and zoning designation for the site, and the vision for this neighborhood in the General Plan. The design of the project will not cause substantial environmental damage, and associated improvements will not cause serious public health problems or conflict with easements, acquired by the public at large, for

access through or use of property within the proposed development.

D. NEW CONDOMINIUM DEVELOPMENT (SBMC §27.13.080)

1. The project complies with all provisions of the City's Condominium Ordinance.

The project complies with the density requirements subject to approval of the lot area modification, and each unit includes adequate covered parking with storage, laundry facilities, separate utility metering, adequate unit size and required private outdoor living space.

2. The proposed development is consistent with the General Plan of the City of Santa Barbara.

The project is consistent with policies of the City's General Plan including the Land Use Element, Housing Element, Conservation Element, Noise Element and Circulation Element. The proposed development is consistent with the principles of sound community planning and will not have an adverse impact upon the neighborhood's aesthetics, parks, streets, traffic, parking and other community facilities and resources. The project will provide infill residential development in the downtown that is compatible with the surrounding neighborhood.

3. The proposed development is consistent with the principles of sound community planning and will not have an adverse impact upon the neighborhood's aesthetics, parks, streets, traffic, parking and other community facilities and resources.

The project is an infill mixed-use project proposed in an area where residential and commercial uses are permitted. The project is adequately served by public streets, will provide adequate parking to meet the demands of the project and will not result in traffic impacts. Adequate park facilities exist nearby, and the project would not adversely impact other community resources, such as water, sewer, police, fire, and schools. The design has been reviewed by the City's design review board, which found the architecture and site design appropriate.

Exhibits:

- A. Conditions of Approval
- B. Site Plan
- C. Applicant's letter dated June 15, 2005
- D. HLC Minutes
- E. Arborist's Report dated October 20, 2004
- F. Applicable General Plan Policies